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FEB 26 ANNUAL AUDITED REPORT FORM X-17A-5 Washington De PART III

FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGI		AND ENDING	12/31/09
	MM/DD/YY	Delektrica war war da war windelija de	MM/DD/YY
	A. REGISTRANT IDENTIFI	CATION	
NAME OF BROKER-DEALER: 1	Elliott Davis Brokerage Se	ervices, LLC	OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE	E OF BUSINESS: (Do not use P.O.)	Box No.)	FIRM I.D. NO.
124 Verdae Boulevard, S			
	(No. and Street)		
Greenville	SC		29607
(City)	(State)		(Zip Code)
	ER OF PERSON TO CONTACT IN	REGARD TO THIS RE	
Jeremy Elliott			1-864-288-2849 (Area Code – Telephone Number
Operation of contract contracts and contract contracts and contract contracts and contract contracts and contracts	B. ACCOUNTANT IDENTIF	ICATION	то постоя на поставления на принципання на принципанна на принципання на при
INDEPENDENT PUBLIC ACCOUNTS J. W. Hunt and Company	NTANT whose opinion is contained	in this Report*	
***************************************	(Name – if individual, state last,	first, middle name)	
PO Box 265	Columbia	SC	29202
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:			
🔀 Certified Public Acco	untant		
☐ Public Accountant			
☐ Accountant not reside	ent in United States or any of its poss	sessions.	
	FOR OFFICIAL USE (ONLY	

^{*}Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

OATH OR AFFIRMATION

	, swear (or affirm) that, to the best of
my knowledge and belief the accompanying financial	statement and supporting schedules pertaining to the firm of
Elliott Davis Brokerage Services, L	LC , as
of December 31	_, 20 09, are true and correct. 1 further swear (or affirm) that
Fig. 1 To A Co. T. S. S. G. Gr. Gr. Are Ayeare raids communications of the seminantal com-	cipal officer or director has any proprietary interest in any account
classified solely as that of a customer, except as follo	ws:
	Bignature
	- 17 - 1
\rightarrow	Principal
	Tifle
\mathcal{L}_{+} \cdot \wedge \wedge	
Janual A	
Notary Public	
his report ** contains (check all applicable boxes):	
图 (a) Facing Page.	
(b) Statement of Financial Condition.	
(c) Statement of Income (Loss).	
(d) Statement of Changes in Financial Condition.	
(e) Statement of Changes in Stockholders' Equity	
(f) Statement of Changes in Liabilities Subordinal	ed to Claims of Creditors.
(g) Computation of Net Capital.	
(h) Computation for Determination of Reserve Re	
(i) Information Relating to the Possession or Com	
	ation of the Computation of Net Capital Under Rule 15c3-1 and the
	Requirements Under Exhibit A of Rule 15c3-3.
	edited Statements of Financial Condition with respect to methods of
consolidation.	
(I) An Oath or Affirmation.	
(m) A copy of the SIPC Supplemental Report.	
(n) A report describing any material inadequacies fo	und to exist or found to have existed since the date of the previous audit
ANNE DE VIGE E CONTROL DE LE LA LA CALLA DE LA CALLA DEL CALLA DEL CALLA DE LA CALLA DE LA CALLA DE LA CALLA DEL CALLA	

**For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

ELLIOTT DAVIS BROKERAGE SERVICES, LLC

REPORT ON FINANCIAL STATEMENTS

YEAR ENDED DECEMBER 31, 2009

(Pursuant to paragraph (d) of Rule 17a-5 of the Securities and Exchange Act of 1934)

ELLIOTT DAVIS BROKERAGE SERVICES, LLC GREENVILLE, SOUTH CAROLINA

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J. W. HUNT AND COMPANY, LLP

JOHN C. CREECH, JR., CPA
ANNE H. ROSS, CPA
WILLIAM F. QUATTLEBAUM, CPA, CVA
WILLIAM T. POUNCEY, CPA
DAVID J. FRYER, CPA

CERTIFIED PUBLIC ACCOUNTANTS

MEMBERS

AMERICAN INSTITUTE OF

CERTIFIED PUBLIC ACCOUNTANTS

PRIVATE COMPANIES PRACTICE SECTION AND

CENTER FOR PUBLIC COMPANY AUDIT FIRMS

CPA ASSOCIATES INTERNATIONAL, INC.,
A WORLDWIDE NETWORK OF ACCOUNTING FIRMS

MIDDLEBURG OFFICE PARK 1607 ST. JULIAN PLACE POST OFFICE BOX 265 COLUMBIA, SC 29202-0265 803-254-8196 866-299-8196 FAX 803-256-1524 jwhunl.com

INDEPENDENT AUDITOR'S REPORT

The Members
Elliott Davis Brokerage Services, LLC
Greenville, South Carolina

We have audited the accompanying statement of financial position of Elliott Davis Brokerage Services, LLC (the "Company"), as of December 31, 2009, and the related statements of operations, changes in member's equity and cash flows for the year then ended, that you are filing pursuant to Rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on the financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we express no such opinion. An audit also includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements, assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Company as of December 31, 2009, and the results of its operations and its cash flows for the year then ended, in conformity with accounting principles generally accepted in the United States of America.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in Schedules 1-3 is presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by Rule 17a-5 under the Securities Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements, and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Columbia, South Carolina February 25, 2010

J. W. Hunt and Company LCP

ELLIOTT DAVIS BROKERAGE SERVICES, LLC STATEMENT OF FINANCIAL CONDITION December 31, 2009

ASSETS

CASH AND CASH EQUIVALENTS	\$ 83,116
COMMISSIONS RECEIVABLE	24,137
PREPAID EXPENSES	16,000
ESCROW DEPOSIT	50,000
INTANGIBLE ASSET, net of accumulated amortization	 18,077
TOTAL ASSETS	 191,330
LIABILITIES AND MEMBER'S EQUITY	•
LIABILITIES AND MEMBER'S EQUITY ACCOUNTS PAYABLE	\$ 36
	\$ 36 650
ACCOUNTS PAYABLE	\$
ACCOUNTS PAYABLE PAYABLE TO PARENT	\$ 650

THE ACCOMPANYING NOTES ARE AN INTEGRAL PART OF THIS STATEMENT

ELLIOTT DAVIS BROKERAGE SERVICES, LLC STATEMENT OF OPERATIONS For the Year Ended December 31, 2009

\$ 701,845
172,000
30,478
 904,323
200,818
65,441
48,405
 314,664
589,659
\$

ELLIOTT DAVIS BROKERAGE SERVICES, LLC STATEMENT OF CHANGES IN MEMBER'S EQUITY For the Year Ended December 31, 2009

	 Total
Balance, December 31, 2008	\$ 87,985
Contribution from member	15,000
Net income	589,659
Distribution of profits to member	 (502,000)
Balance, December 31, 2009	 190,644

ELLIOTT DAVIS BROKERAGE SERVICES, LLC STATEMENT OF CASH FLOWS For the Year Ended December 31, 2009

OPERATING ACTIVITIES	
Net income	\$ 589,659
Amortization	1,643
Adjustments to reconcile net income to net cash	
provided by operating activities:	
Net changes in operating assets and liabilities:	
Commissions receivable	(24,137)
Prepaid expenses	(9,689)
Accounts payable	36
Payable to member	 650
Net cash (used for) provided by operating activities	 558,162
INVESTING ACTIVITIES	
Escrow deposit	(50,000)
Net cash (used for) provided by investing activities	 (50,000)
FINANCING ACTIVITIES	
Capital contribution from member	15,000
Distributions to member	(502,000)
Repayment of borrowings from member	(8,500)
Net cash provided by financing activities	 (495,500)
Increase in cash and cash equivalents	12,662
CASH AND CASH EQUIVALENTS, BEGINNING OF PERIOD	 70,454
CASH AND CASH EQUIVALENTS, END OF PERIOD	 83,116

THE ACCOMPANYING NOTES ARE AN INTEGRAL PART OF THIS STATEMENT

ELLIOTT DAVIS BROKERAGE SERVICES, LLC NOTES TO FINANCIAL STATEMENTS

NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES AND ACTIVITIES

Nature of Operations and Acquisition

Elliott Davis Brokerage Services, LLC (the "Company"), which has one office in Greenville, South Carolina, commenced operations on September 18, 2008 as a result of an acquisition by Elliott Davis Investment Partners, LLC (the "Parent"). The Company is a broker-dealer in securities registered with the Securities and Exchange Commission ("SEC") and is a member of various exchanges and the Financial Industry Regulatory Authority ("FINRA"). The Company was formerly known as Atlantic Capital Securities, LLC ("ACS") and was organized under the laws of the state of North Carolina on July 17, 1996 to provide investment services to investors as a fully disclosed introducing broker-dealer. On June 30, 2007, ACS changed its name to JSP Securities, LLC D/B/A Atlantic Capital Securities ("JSP"). JSP was licensed to operate in six states. It operated in states other than North Carolina primarily through independent representatives.

Revenue recognition

The Company recognizes revenue from securities transactions on a trade-date basis.

Basis of Presentation

The Company's policy is to prepare its financial statements in accordance with accounting principles generally accepted in the United States of America.

Cash equivalents

All short-term, highly liquid investments with an original maturity of three months or less are considered cash and cash equivalents.

Commissions Receivable

Commissions receivable represent December commissions received in January and do not require an allowance for uncollectible amounts.

Income taxes

The Company is classified as a partnership for federal income tax purposes. Accordingly, no provision for income taxes is made in the financial statements of the Company. Taxable income or loss is reported in the income tax return of its member.

Personal assets and liabilities of the member

In accordance with the generally accepted method of presenting limited liability company financial statements, the financial statements do not include the personal assets and liabilities of the member, including its obligation for income taxes on its distributive share of net income of the Company or its rights to refunds on its net loss, nor any provision for income tax expense or an income tax refund. The member does not have any personal liability for any obligations of the Company.

(Continued)

NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES AND ACTIVITIES, Continued

Use of estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Subsequent events:

In May, 2009 the Financial Accounting Standards Board (FASB) issued new guidance related to subsequent event disclosure. Accordingly the Company has considered subsequent events through February 25, 2010, the date of issuance, in preparing the financial statements and notes hereto.

NOTE 2- INTANGIBLE ASSETS

The gross carrying amount, accumulated amortization as of December 31, 2009 and amortization expense are as follows:

Gross carrying amount	\$19,720
Accumulated amortization	1,643
Amortization expense	1,643

Estimated amortization expense for each of the next five years is expected to be \$1,314.

NOTE 3 - RELATED PARTY

In January 2009, the Company entered into an agreement with its Parent to sub-lease office space under an operating lease with an initial term of 31 days at a monthly rent of \$650. The lease may be renewed on a month to month basis by mutual consent and can be canceled with 90 days notice to the Parent. The Company paid \$7,800 in rent during the year with \$650 payable at December 31, 2009. The Company has no direct employees but uses the services of employees of the members of the Parent. No value has been placed on these services.

NOTE 4- NET CAPITAL REQUIREMENT

The Company is subject to the SEC Uniform Net Capital Rule (Rule 15c3-1), which requires the maintenance of minimum net capital. The Company has elected to use the basic method, permitted by the Rule, which requires that the Company maintain minimum net capital of \$50,000, as defined, and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At December 31, 2009, the Company had net capital, as defined, of \$141,556 which was \$91,556 in excess of its required net capital, and its ratio of aggregate indebtedness to net capital was .005 to 1. See Supplementary Schedule 1 for these calculations.

THESE NOTES ARE AN INTEGRAL PART OF THE ACCOMPNAYING FINANCIAL STATEMENTS

SUPPLEMENTARY INFORMATION

Pursuant to Rule 17a-5 of the Securities Exchange Act of 1934

As of December 31, 2009

ELLIOTT DAVIS BROKERAGE SERVICES, LLC COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SEC December 31, 2009

NET CAPITAL

Liabilities subordinated to claims of general creditors allowable in computation of net capital 7 Total capital and allowable subordinated liabilities 7 Total capital and allowable subordinated liabilities 7 Total capital and allowable subordinated liabilities 7 DEDUCT 8 Nonallowable assets from Statement of Financial Condition: 8 Prepaid expenses 8 16,000 15,011 15,011 16,000 11,000	TOTAL MEMBER'S EQUITY		\$ 190,643
allowable in computation of net capital Total capital and allowable subordinated liabilities DEDUCT Nonallowable assets from Statement of Financial Condition: Prepaid expenses Accounts receivable - non-allowable Goodwill Goodwill Net capital before haircuts on securities positions Net capital before haircuts on securities positions AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION AGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness AGGREGATE INDEST TOTAL CONDITION RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661	ADD		
DEDUCT Nonallowable assets from Statement of Financial Condition: Prepaid expenses \$ 16,000 Accounts receivable - non-allowable 15,011 Goodwill 18,077 49,088 Net capital before haircuts on securities positions 141,555 Haircuts on securities Net capital 141,555 Haircuts on securities AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION \$ 686 ADD Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness 686 RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL .005 to 1 RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable 5,895	<u> </u>		
Nonallowable assets from Statement of Financial Condition: Prepaid expenses Accounts receivable - non-allowable I5,011 Goodwill Net capital before haircuts on securities positions Net capital before haircuts on securities Positions Haircuts on securities Net capital AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION AGRADD Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness AGGREGATE INDEBTEDNESS TO NET CAPITAL RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661 5,895	Total capital and allowable subordinated liabilities		190,643
Prepaid expenses Accounts receivable - non-allowable Goodwill Goodwill Net capital before haircuts on securities positions Haircuts on securities Net capital AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION ADD Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness AGTO FAGGREGATE INDEBTEDNESS TO NET CAPITAL RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 16,000 15,011 18,077 49,088 141,555 141,555	DEDUCT		
Accounts receivable - non-allowable Goodwill Reconcil a before haircuts on securities positions Haircuts on securities Net capital AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable 15,011 18,077 49,088 141,555 141,555	Nonallowable assets from Statement of Financial Condition:		
Goodwill18,07749,088Net capital before haircuts on securities positions141,555Haircuts on securities-Net capital141,555AGGREGATE INDEBTEDNESSLIABILITIES FROM STATEMENT OF FINANCIAL CONDITION\$ 686ADD Market value of securities borrowed for which no equivalent value is paid or credited-Total aggregate indebtedness686RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL.005 to 1RECONCILIATION TO FOCUS REPORTNet capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable\$ 135,661	Prepaid expenses	\$ 16,000	
Net capital before haircuts on securities positions Haircuts on securities Net capital AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness 686 RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL .005 to 1 RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661	Accounts receivable - non-allowable	15,011	
Haircuts on securities Net capital AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION ADD Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness 686 RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL Description of the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661 5,895	Goodwill	18,077	49,088
Net capital AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION ADD Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness 686 RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661	Net capital before haircuts on securities positions		141,555
AGGREGATE INDEBTEDNESS LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION \$ 686 ADD Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness 686 RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL .005 to 1 RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable 5,895	Haircuts on securities		
LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION ADD Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness 686 RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL .005 to 1 RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661	Net capital		141,555
ADD Market value of securities borrowed for which no equivalent value is paid or credited Total aggregate indebtedness 686 RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL .005 to 1 RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661	AGGREGATE INDEBTEDNESS		
Market value of securities borrowed for which no equivalent value is paid or credited	LIABILITIES FROM STATEMENT OF FINANCIAL CONDITION		\$ 686
Market value of securities borrowed for which no equivalent value is paid or credited	ADD		
RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661 5,895	Market value of securities borrowed for which no equivalent		
RECONCILIATION TO FOCUS REPORT Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661 5,895	Total aggregate indebtedness		686
Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report Audit adjustment to record an allowable mutual fund receivable \$ 135,661 5,895	RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL		.005 to 1
Audit adjustment to record an allowable mutual fund receivable 5,895	RECONCILIATION TO FOCUS REPORT		
Audit adjustment to record an allowable mutual fund receivable 5,895	Net capital, as reported in the Company's Part IIA (unaudited) FOCUS report		\$ 135,661
Net capital per above 141,556			5,895
	Net capital per above		141,556

ELLIOTT DAVIS BROKERAGE SERVICES, LLC COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS UNDER RULE 15c3-3 OF THE SEC DECEMBER 31, 2009

CREDIT BALANCES		
Free credit balances and other credit balances in customers' security accounts	\$	
Monies borrowed collateralized by securities carried for the accounts of customers		
Monies payable against customers' securities loaned		
Customers' securities failed to receive		
Credit balances in firm accounts that are attributable to principal sales to customers		
Market value of stock dividends, stock splits, and similar distributions receivable outstanding over thirty calendar days		
Market value of short security count differences over thirty calendar days old		
Market value of short securities and credits in all suspense accounts over thirty calendar days		
Market value of securities that are in transfer in excess of forty calendar days and		
have not been confirmed to be in transfer by the transfer agent or the issuer		
Total credit items	 	
DEBIT BALANCES		
Debit balances in customers' cash and margin excluding unsecured accounts and accounts doubtful of collection net of deductions pursuant to Rule 15c3-3	\$	
Securities borrowed to effectuate short sales by customers and securities borrowed to make delivery on customers' securities failed to deliver		
Failed to deliver of customers' securities not older than 30 calendar days		
Total debit items		

The Company is exempt from the provisions of Rule 15c3-3 under paragraph (k)(2)(ii) in that the Company carries no accounts, does not hold funds or securities for or owe money or securities to customers. The Company effectuates all financial transactions on behalf of customers on a fully disclosed basis.

Accordingly, there are no items to report under the requirements of this Rule.

There are no material differences between this schedule and the Company's unaudited quarterly filing of the Part IIA FOCUS report.

ELLIOTT DAVIS BROKERAGE SERVICES, LLC INFORMATION RELATING TO THE POSSESSION OR CONTROL REQUIREMENTS UNDER RULE 15c3-3 OF THE SEC DECEMBER 31, 2009

Customers' fully paid securities and excess margin securities not in the respondent's possession or control as of the report date (for which instructions to reduce to possession or control had been issued as of the report date) but for which the required action was not taken by respondent within the time frames specified under Rule 15c3-3		<u>\$</u>	·
Number of items			
Customers' fully paid securities and excess margin securities for which instructions to reduce to possession or control had not been issued as of the report date, excluding items arising from "temporary lags which result from normal business operations" as permitted under Rule 15c3-3			
Number of items			

The Company is exempt from the provisions of Rule 15c3-3 under paragraph (k)(2)(ii) in that the Company carries no accounts, does not hold funds or securities for or owe money or securities to customers. The Company effectuates all financial transactions on behalf of customers on a fully disclosed basis.

Accordingly, there are no items to report under the requirements of this Rule.

INDEPENDENT AUDITOR'S REPORT ON INTERNAL ACCOUNTING CONTROL

J. W. HUNT AND COMPANY, LLP

JOHN C. CREECH, JR., CPA
ANNE H. ROSS, CPA
WILLIAM F. QUATTLEBAUM, CPA, CVA
WILLIAM T. POUNCEY, CPA
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MIDDLEBURG OFFICE PARK 1607 ST. JULIAN PLACE POST OFFICE BOX 265 COLUMBIA, SC 29202-0265 803-254-8196 866-299-8196 FAX 803-256-1524 jwhunt.com

The Members Elliott Davis Brokerage Services, LLC Greenville, South Carolina

In planning and performing our audit of the financial statements of Elliott Davis Brokerage Services, LLC (the Company), as of December 31, 2009 in accordance with auditing standards generally accepted in the United States of America, we considered the Company's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we do not express an opinion on the effectiveness of the Company's internal control.

Also, as required by Rule 17a-5(g)(1) of the Securities and Exchange Commission (SEC), we have made a study of the practices and procedures followed by the Company including consideration of control activities for safeguarding securities. This study included tests of such practices and procedures that we considered relevant to the objectives stated in Rule 17a-5(g) in making the periodic computations of aggregate indebtedness (or aggregate debits) and net capital under Rule 17a-3(a)(11) and for determining compliance with the exemptive provisions of Rule 15c3-3. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Company in any of the following:

- 1. Making quarterly securities examinations, counts, verifications, and comparisons and recordation of differences required by Rule 17a-13
- 2. Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System

The management of the Company is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls and of the practices and procedures referred to in the preceding paragraph and to assess whether those practices and procedures can be expected to achieve the SEC's above-mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in conformity with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control and the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

A control deficiency exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected by the entity's internal control.

A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the entity's internal control.

Our consideration of internal control was for the limited purpose described in the first and second paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. However, we identified the following deficiency in internal control that we consider to be a material weakness, as defined above. This condition was considered in determining the nature, timing and extent of the procedures performed in our audit of the Company's financial statements as of December 31, 2009, and this report does not affect our report thereon dated February 25, 2010.

Statements on Auditing Standards No. 112, which became effective for years ending after December 15, 2006, defines internal control over financial reporting to require the client to prepare its own financial statements, including note disclosures, in accordance with generally accepted accounting principles without any material adjusting journal entries proposed by the auditor. As part of our current engagement as the Company's auditor, we have proposed material adjusting journal entries to reclassify partner's distributions from the statement of operations to the statement of financial condition and accrue revenue in accordance with generally accepted accounting principals subject to the review and acceptance of the Company's management.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures, as described in the second paragraph of this report, were adequate at December 31, 2009, to meet the SEC's objectives.

This report is intended solely for the information and use of the Members, management, the Financial Industry Regulatory Authority ("FINRA"), the SEC, and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

Columbia, South Carolina February 25, 2010 J. W. Hunt and Company LLP